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November 2, 2016

Via Electronic Mail

The Honorable Tom Wheeler  
Chairman  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

RE: Maritime Communications/Land Mobile (MCLM);  
WT Docket No. 13-85, EB Docket No. 11-71

Dear Chairman Wheeler:

On behalf of Dixie Electric Membership Corporation ("DEMCO"), I urge the Commission to move quickly and decisively in this proceeding that has gone on for far too many years. The frequencies at issue are necessary for DEMCO's continuing operations relating to essential services and public safety in the Baton Rouge, Louisiana area. For planning purposes relating to the well-being of the citizens of Louisiana, DEMCO needs to have these frequencies permanently assigned and calls for prompt action by the Commission.

DEMCO is a rural electric cooperative providing electric service to more than 100,000 locations throughout seven rural parishes in Louisiana. As evidenced by the massive flooding caused by the storm of this past August, the State of Louisiana, including the region served by DEMCO, is particularly vulnerable to severe weather events threatening life and property due to its location off the Gulf of Mexico. The August storm resulted in the DEMCO region being declared a federal disaster area by FEMA, with much property destruction and human suffering. In a number of other emergency operations over the years, including Hurricane Katrina, the DEMCO region has served as a staging area providing assistance to federal and state agencies.

In all of these situations, effective communications is at the heart of response and recovery efforts. When power outages occur as a result of severe weather conditions or other disasters, leaving hundreds of thousands of people without power, restoring power to every home, hospital, care center, government office and place of business is a public safety emergency. Maintaining reliable and secure communications during such emergency response conditions is of ultimate importance to DEMCO and to the citizens we serve.

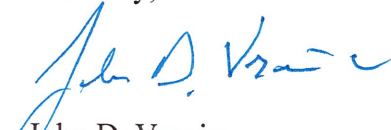
In order to be prepared for these critical public safety operations, DEMCO entered into an arms-length agreement with Maritime Communications/Land Mobile, LLC (MCLM) in 2010 – *six years ago* - to acquire certain frequencies in our service area. The agreement with MCLM called for the partitioning of Maritime's geographic license Call Sign WQGF316 to cover

DEMCO's service area in the Baton Rouge region. The assignment application from MCLM to DEMCO was filed along with notification of a spectrum lease that permits operation on these channels while the application is being processed.<sup>1</sup> Nevertheless, DEMCO needs certainty in its communications operations for important long-range public safety planning purposes.

Although DEMCO is a completely innocent party, the assignment of these frequencies has been tied up in an FCC hearing (and a bankruptcy proceeding in Mississippi) involving MCLM for many years.<sup>2</sup> It is my understanding that the Commission is finally prepared to take action in this matter. With this in mind, I implore the Commission to authorize on a permanent basis DEMCO's use of these frequencies.

Thank you for your attention to this matter.

Sincerely,



John D. Vranic  
CEO and General Manager

cc: Commissioner Clyburn  
Commissioner Pai  
Commissioner Rosenworcel  
Commissioner O'Rielly  
Ruth Milkman  
Edward Smith  
Jon Wilkins  
Certificate of Service List (Attached)

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<sup>1</sup> See File Nos. 0004507921 and 0004526878.

<sup>2</sup> Maritime Communications/Land Mobile, LLC, Order to Show Cause, Hearing Designation Order, and Notice of Opportunity for Hearing, FCC 11-64, Apr. 19, 2011; MCLM enters into bankruptcy proceedings in Mississippi (See, August 1, 2011, Bankruptcy filing In Re Maritime Communications/Land Mobile, LLC, Voluntary Petition for Chapter 11 Bankruptcy, No. 11-13463 (N.D. Miss. filed Aug. 1, 2011); a Debtor in Possession assumed MCLM's obligations (See, In Re Maritime Communications/Land Mobile, LLC, Debtor-in-Possession Application to Assign Licenses to Choctaw Holdings, LLC, Memorandum Opinion and Order, FCC 14-133, (rel. Sept. 11, 2014); and the Bankruptcy Court approved an offer by Choctaw Holdings, LLC ("Choctaw") to take-over MCLM's assets subject to final Commission approval regarding the FCC licenses at issue in the hearing (Maritime Communications/Land Mobile, LLC, Case No. 11-13463-DWH (N.D. Miss Bank. Ct., Nov. 15, 2012).

## CERTIFICATE OF SERVICE

I, Beverly Harding, hereby certify that on this 2<sup>nd</sup> day of November, 2016, a copy of the foregoing Letter was filed with the Commission, served on the parties listed below via First Class U.S. Mail and a courtesy copy was provided via electronic mail.

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/s/

**Beverly Harding**